

FILED

JAN - 7 2016

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUISUNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 4:15 CR 404 HEA (NAB)
v.)	
)	
JOSE ALFREDO VELAZQUEZ, et al.,)	
)	<u>FILED UNDER SEAL</u>
Defendants.)	
)	

MOTION TO SEAL

COMES NOW the United States of America, by and through the United States Attorney for the Eastern District of Missouri, Richard G. Callahan, and Michael A. Reilly, Assistant United States Attorney for said District, and states the following:

Government hereby requests that this matter, S1-4:15CR404 HEA/NAB, be sealed until arrest warrants may be executed in this matter. The Government anticipates that the arrest warrants will be executed on or about January 13, 2016.

A single defendant, Anthony Jordan, was previously indicted in this matter for three counts that include the following violations: (1) Title 21, United States Code, Sections 846 and 841(a)(1); (2) Two violations of Title 18, United States Code, Sections 924(c)(1)(A), (j) and Section 2. Multiple deaths resulted from the firearms violations charged in the original indictment. Anthony Jordan is currently in custody.

The Grand Jury has returned a superseding indictment charging a total of eighteen defendants with multiple violations of Title 21, United States Code, Sections 848, 841, and 846. Multiple defendants are subject to twenty and ten year mandatory minimum sentences. Moreover, multiple defendants are charged with homicide and firearms offenses in which death

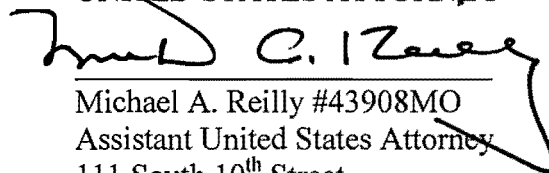
resulted.

As grounds for its request that the indictment be sealed until additional defendants are taken into custody on January 13, 2016, the Government states that due to the nature of the charges, there is an extreme danger to the arresting agents officers and to the community were the superseding indictment to become public prior to the initial "round up." Moreover, most of the eighteen defendants present substantial flight risks, many of them with extensive criminal histories.

The Government requests that Anthony Jordan's initial appearance on the superseding indictment be delayed until after the initial round up is executed on January 13, 2016; this delay is less than one week.

Respectfully submitted,

RICHARD G. CALLAHAN
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Michael A. Reilly", is written over a horizontal line.

Michael A. Reilly #43908MO
Assistant United States Attorney
111 South 10th Street
St. Louis, Missouri 63102
(314) 539-2200